

<p><b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b></p>	
<p><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b></p> <p><b>GENOVA BURNS LLC</b>  Daniel M. Stolz, Esq.  Donald W. Clarke, Esq.  Matthew I.W. Baker, Esq.  dstolz@genovaburns.com  dclarke@genovaburns.com  mbaker@genovaburns.com  110 Allen Road, Suite 304  Basking Ridge, NJ 07920  Tel: (973) 467-2700  Fax: (973) 467-8126  <i>Proposed Local Counsel to the Official Committee of Talc Claimants</i></p>	<p><b>BROWN RUDNICK LLP</b>  David J. Molton, Esq.  Robert J. Stark, Esq.  Michael S. Winograd, Esq.  Eric R. Goodman, Esq.  dmolton@brownrudnick.com  rstark@brownrudnick.com  mwinograd@brownrudnick.com  egoodman@brownrudnick.com  Seven Times Square  New York, NY 10036  Tel: (212) 209-4800  Fax: (212) 209-4801  and  Jeffrey L. Jonas, Esq.  Sunni P. Beville, Esq.  jjonas@brownrudnick.com  sbeville@brownrudnick.com  One Financial Center  Boston, MA 02111  Tel: (617) 856-8200  Fax: (617) 856-8201  <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>
<p><b>MASSEY &amp; GAIL LLP</b>  Jonathan S. Massey, Esq.  Rachel S. Morse, Esq.  jmassey@masseygail.com  rmorse@masseygail.com  1000 Maine Ave. SW, Suite 450  Washington, DC 20024  Tel: (202) 652-4511  Fax: (312) 379-0467  <i>Proposed Special Counsel for the Official Committee of Talc Claimants</i></p>	<p><b>OTTERBOURG P.C.</b>  Melanie L. Cyganowski, Esq.  Richard G. Haddad, Esq.  Adam C. Silverstein, Esq.  Jennifer S. Feeney, Esq.  David A. Castleman, Esq.  mcyganowski@otterbourg.com  rhaddad@otterbourg.com  asilverstein@otterbourg.com  jfeeney@otterbourg.com  dcastleman@otterbourg.com  230 Park Avenue  New York, NY 10169  Tel: (212) 661-9100  Fax: (212) 682-6104  <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i></p>

In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**DECLARATION OF DANIEL M. STOLZ IN SUPPORT OF  
MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS  
TO DISMISS SECOND BANKRUPTCY PETITION OF LTL MANAGEMENT, LLC**

I, Daniel M. Stolz, pursuant to 28 U.S.C. § 1746, declare, under penalty of perjury, that the following is true and correct:

1. I am a partner with law firm Genova Burns LLC, proposed local counsel to the Official Committee of Talc Claimants (the “TCC” or “Committee”).

2. I submit this declaration to place in the record on the *Motion of the Official Committee of Talc Claimants to Dismiss Second Bankruptcy Petition of LTL Management, LLC* (the “Motion”) certain documents submitted in connection with the Motion.

3. Attached hereto as Exhibit 1, is a true and correct copy of the transcript of proceedings held on April 20, 2023 in the bankruptcy case *In re LTL Management LLC*, Case No. 23-12825 (MBK) (Bankr. D.N.J.).

4. Attached hereto as Exhibit 2, is a true and correct copy of the transcript of proceedings held on April 18, 2023 in the bankruptcy case *In re LTL Management LLC*, Case No. 23-12825 (MBK) (Bankr. D.N.J.).

---

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

5. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript of the deposition of Richard Dickinson taken on April 17, 2023, in connection with this matter.

6. Attached hereto as Exhibit 4, **filed under seal**, is a true and correct copy of a presentation dated April 2, 2023, bearing Bates numbers LTLMGMT-00000260 to LTLMGMT-00000271 produced by the Debtor in connection with this matter.<sup>2</sup>

7. Attached hereto as Exhibit 5, **filed under seal**, is a true and correct copy of a document entitled “Minutes of Board of Managers” dated March 16, 2023, bearing Bates numbers LTLMGMT-00002626 to LTLMGMT-00002627 produced by the Debtor in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*.

8. Attached hereto as Exhibit 6, **filed under seal**, is a true and correct copy of a document entitled “Minutes of Board of Managers” dated March 28, 2023, bearing Bates numbers LTLMGMT-00000001 to LTLMGMT-00000005 produced by the Debtor in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*.

9. Attached hereto as Exhibit 7, **filed under seal**, is a true and correct copy of a presentation dated March 28, 2023, bearing Bates numbers LTLMGMT-00000233 to LTLMGMT-00000259 produced by the Debtor in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*.

10. Attached hereto as Exhibit 8, **filed under seal**, is a true and correct copy of a document entitled “Minutes of Board of Managers” dated April 2, 2023, bearing Bates numbers LTLMGMT-00000006 to LTLMGMT-00000019 produced by the Debtor in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*.

---

<sup>2</sup> The Committee is filing this exhibit and certain other exhibits under seal given the designation of the document as confidential by LTL Management LLC (the “Debtor”), pending the entry of a protective order in this case. By filing these exhibits under seal, the Committee does not waive any rights as to the confidentiality designation or use of any such exhibit, and expressly reserves all applicable rights.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts of the Motion to Stay Mandate filed on March 22, 2023 by LTL Management LLC with the United States Court of Appeals for the Third Circuit in *In re LTL Management LLC*, Case No. 22-2003, Dkt. 173.

12. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the transcript of proceedings held on February 18, 2022 in the bankruptcy case *In re LTL Management LLC*, Case No. 21-30589 (MBK) (Bankr. D.N.J.).

13. Attached hereto as Exhibit 11 is a true and correct copy of the Amended and Restated Funding Agreement dated October 12, 2021.

14. Attached hereto as Exhibit 12 is a true and copy of the October 14, 2021 Declaration of John K. Kim in Support of First Day Pleadings filed in *In re LTL Management LLC*, Case No. 21-30589 (MBK) (Bankr. D.N.J.), Dkt. 5.

15. Attached hereto as Exhibit 13, **filed under seal**, is a true and correct copy of excerpts of the transcript of the deposition of John K. Kim taken on April 14, 2023, in this Adversary Proceeding, subject to the reservation of rights as stated in note 2, *supra*.

16. Attached hereto as Exhibit 14 is a true and correct copy of excerpts of the transcript of proceedings held on September 19, 2022 before the United States Court of Appeals for the Third Circuit in *In re LTL Management LLC*, Case No. 22-2003.

17. Attached hereto as Exhibit 15 is a true and correct copy of the Supporting Documentation to the Debtor's February 2023 Monthly Operating Report filed in *In re LTL Management LLC*, Case No. 21-30589 (MBK) (Bankr. D.N.J. Mar. 21, 2023), Dkt. No. 3886-1.

18. Attached hereto as Exhibit 16, **filed under seal**, is a true and correct copy of excerpts of the transcript of the deposition of Erik Haas taken on April 14, 2023, in this Adversary Proceeding, subject to the reservation of rights as stated in note 2, *supra*.

19. Attached hereto as Exhibit 17 is a true and correct copy of excerpts of the transcript of proceedings held on April 11, 2023 in the bankruptcy case *In re LTL Management LLC*, Case No. 23-12825 (MBK) (Bankr. D.N.J.).

20. Attached hereto as Exhibit 18 is a true and correct copy of a document titled “Form 8-K,” dated April 4, 2023, filed by Johnson and Johnson with the United States Securities and Exchange Commission.

21. Attached hereto as Exhibit 19, **filed under seal**, is a true and correct copy of excerpts of the transcript of the deposition of Adam Pulaski taken on April 15, 2023, in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*.

22. Attached hereto as Exhibit 20, **filed under seal**, is a true and correct copy of excerpts of the transcript of the deposition of Mikal Watts taken on April 17, 2023, in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*

23. Attached hereto as Exhibit 21, **filed under seal**, is a true and correct copy of excerpts of the transcript of the deposition of James Murdica taken on April 16, 2023, in connection with this matter, subject to the reservation of rights as stated in note 2, *supra*

24. Attached hereto as Exhibit 22, **filed under seal**, is a true and correct copy of an email dated February 26, 2023 from Mikal Watts to James Murdica and Jason Itken (attached as Exhibit 6 to the April 17, 2023 Deposition of Mikal Watts).

25. Attached hereto as Exhibit 23 is a true and correct copy of excerpts of the Brief for Debtor-Appellee filed with the United States Court of Appeals for the Third Circuit in *In re LTL Management LLC*, Case No. 22-2003, Dkt. 104.

26. Attached hereto as Exhibit 24 is a true and correct copy of the March 31, 2023 Judgment and Mandate issued by the United States Court of Appeals for the Third Circuit in *In re LTL Management LLC*, Case No. 22-2003, Dkt. 181-1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in the State of New Jersey on April 24, 2023.

/s/ Daniel M. Stolz  
Daniel M. Stolz